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MEMORANDUM

TO: Chris Petersen, DPO
EPA Region 6 Response and Prevention Branch

THRU: Chris Quina, TATL
Region 6 Technical Assistance Team

FROM: Kevin Jaynes, Project Manager *KJ*
Region 6 Technical Assistance Team

DATE: August 18, 1995

REF: Contract Number 68-WO-0037
TDD #: T06-9508-902
PAN: E06Z263SAM

SUBJECT: Site Inspection Prioritization
Crow & Sons Landfill (a.k.a. V.M. Crow & Sons, Inc.; Crow & Sons, Inc.)
Forth Worth, Tarrant County, Texas
CERCLIS#: TXD078543071
32°49'00" N Latitude, 97°31'09" W Longitude

INTRODUCTION

The Region 6 Technical Assistance Team (TAT) was tasked by the U.S. Environmental Protection Agency (EPA) to complete a Site Inspection Prioritization (SIP) for the Crow & Sons Landfill, Fort Worth, Tarrant County, Texas. The objectives of the SIP are to generate a site score based on the revised Hazard Ranking System (HRS) with the available data, identify data gaps which would influence the site score and provide the EPA sufficient information to make the determination whether further investigation is warranted or to receive the classification of No Further Remedial Action Planned (NFRAP) under the Superfund Amendments and Reauthorization Act (SARA).

SITE HISTORY AND DESCRIPTION

The Crow & Sons Landfill, located on Farm Road 1886, Fort Worth, Tarrant County, Texas began operations in July 1976. The facility is reportedly between 78 to 120 acres and is located on the site of an old sand and gravel mining operation. Preliminary Assessments (PAs) were completed for the site on November 23, 1979 and December 10, 1979, indicating that the site was registered with the Texas Department of Health (TDH) (Permit #208) as a 10

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acre landfill receiving solid, liquid, sludge and municipal wastes. Routine inspections which were conducted by the TDH found the landfill to be in compliance and a Site Inspection (SI) was not completed for the site.

The facility submitted a Notification of Hazardous Waste Site (EPA Forms 8700-12) on August 18, 1980; September 22, 1980; and December 9, 1980 indicating that the facility was involved in receiving EPA hazardous waste codes K079 and U013. The facility also submitted Resource Conservation and Recovery Act (RCRA) Part A application forms (EPA Form 3510-1 and 3510-3) indicating that the facility was operating as a sanitary landfill under TDH Permit #208 and accepted for treatment/storage and disposal specific hazardous waste as approved by the TDH.

A memorandum from the TDH to the EPA on April 19, 1982 identified the V.M. Crow & Sons, Inc. site as major hazardous waste treatment, storage and/or disposal (TSD) facility which had interim status.

On November 9, 1982, the facility notified the EPA that the hazardous centrifuge wastes from General Dynamics Fort Worth Division (GD) being accepted for disposal had been reclassified by the Texas Department of Water Resources (TDWR) as non-hazardous Class I wastes, and as a result, no longer intended to dispose of hazardous waste on-site. The facility would continue to accept Class I non-hazardous wastes for disposal. GD had assumed that the centrifuge wastes (TDWR Code #140080) were hazardous since they could not be adequately classified; however, EP toxicity testing conducted on the wastes during the summer of 1981 showed that the wastes were non-hazardous. GD provided the TDWR with the test results and received the reclassification of the wastes as Class I non-hazardous. GD also maintained the centrifuge wastes previously disposed of at the Crow and Sons Landfill were also non-hazardous since all of the centrifuge waste disposed of since 1976 had been generated using the same processes and treatments as the wastes tested. Based on the information provided by Crow and Sons and GD, the EPA acknowledged that the Crow and Sons Landfill did not engage in TSD activities and was listed as a Non-Handler.

SITE INSPECTION PRIORITIZATION OVERVIEW

Based on information obtained from the PAs and from the EPA non-technical RCRA file for the Crow & Sons Landfill site; there is no evidence that any activities relating to the transport, handling or disposal of hazardous wastes has occurred on-site. The facility reportedly operated within permitted compliance of the TDH as a Class I non-hazardous waste landfill. Based on file information that the site did not actually receive CERCLA eligible hazardous wastes, the resulting overall site score for the Crow & Sons Landfill site would not be sufficient for National Priorities List (NPL) placement.